

1 IN THE UNITED STATES DISTRICT COURT

2 SOUTHERN DISTRICT OF NEW YORK

3 GÉRARD SILLAM and)
4 ALDRIC SAULNIER)
5 Plaintiffs,)
6 vs) Civil Action No.
7 LABATON SUCHAROW LLP and) 21 CV 6675(CM)(OTW)
8 CHRISTOPHER J. KELLER,)
9 Defendants.)
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12 ORIGINAL

14 Volume I of II

15 Deposition of Gérard Sillam

16 taken on

17 Friday, May 5, 2023

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Reported by: Shelle Higgins

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CSR NO. 10455, CLVS

1 Deposition of Gérard Sillam, taken on behalf of the
2 parties at Reed Smith LLP, 112 avenue Kléber, 75116,
3 Paris, France, on Friday, May 5, 2023, at 3:00 p.m.,
4 before Shelle Higgins, CSR NO. 10455, pursuant to
5 notice.

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7 APPEARANCES:

8

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1 anyone before today?

2 **A.** Yes, to my lawyer.

3 **MR. MATETSKY:** I'll note for the record it's
4 possible I missed something, but I don't recall ever
5 seeing it before.

15:59

6 **MS. LARROQUE:** I wish to circulate the
7 document.

8 **MR. MATETSKY:** We would appreciate that, and
9 I'll reserve the right to come back to it at the end
10 of the day.

15:59

11 **BY MR. MATETSKY:**

12 **Q.** Mr. Sillam, have you ever been convicted of
13 a crime anywhere outside of France?

14 **A.** No, never.

15 **Q.** Has any company that you own or are
16 affiliated with been convicted of a crime either
17 inside or outside France?

16:00

18 **A.** No.

19 **Q.** And do you understand when I say convicted
20 of a crime, I'm including both either pleading guilty
21 or being convicted after a trial?

16:00

22 **A.** Yes, I understand.

23 **Q.** Mr. Sillam, have you ever been the subject
24 of a criminal investigation by the authorities in
25 France?

16:01

1 **MR. REDA:** Objection. Note my objection to
2 an improper question.

3 **BY MR. MATETSKY:**

4 **Q.** You can answer.

5 **A.** Yes.

6 **Q.** Approximately how many times have you been
7 the subject of a criminal investigation by the French
8 authorities?

9 **A.** Four. Four or five.

10 **Q.** How did that come about?

11 **A.** I have absolutely no problem in answering
12 your questions. Let's start with the receivership.
13 I went into receivership, as I indicated earlier, on
14 a personal basis in 1994 for my real estate business.
15 That real estate business held a lot of assets and
16 the bankruptcy trustee had a lot of questions about
17 these assets.

18 In fact, these questions related mainly to
19 the selling price of the real estate, the buildings,
20 because between 1990 and 1997, France experienced a
21 major real estate crisis. Real estate prices, in
22 fact, collapsed all together, and this meant we had
23 to sell at a price which was lower than the buying
24 price.

25 The bankruptcy trustee's job is precisely to 16:04